

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

Postal Rate and Fee Changes, 2006]

DOCKET NO. R2006-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-439-453]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure. To reduce the volume of paper, I have combined related requests into a single numbered interrogatory; however, I am requesting that a specific response be made to each separate question asked. To the extent that a reference is made in the responses to a Library Reference, I would appreciate receiving a copy of the reference since I am located at a distance from Washington, DC. Any reference to testimony should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-1-18 in Docket C2001-1, dated May 19, 2001, are incorporated herein by reference. In accordance with the provisions of Rule 25[b], I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

August 3, 2006

Respectfully submitted,

R20061NN439

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

---

---

DBP/USPS-439                      Please refer to your response to Interrogatory DBP/USPS-104 subparts b and c.

[a]     Please describe any differences between the Move Validation Letter that is sent for a Change of Address Order that was submitted on the Internet, by telephone, and in writing.

[b]     Please provide sample copies of each of these letters.

DBP/USPS-440                      Please refer to your response to Interrogatory DBP/USPS-104 subparts b and c.

If a fraudulent Change of Address Order were to be filed from address A to address B and the Move Validation Letter is sent to address A, won't it be forwarded to address B [since there is an outstanding Change of Address Order] and therefore the unsuspecting resident at address A will be unaware of the fraudulent order that had been filed?

DBP/USPS-441                      Please refer to your response to Interrogatory DBP/USPS-104 subparts b and c.

[a]     Is there a mandatory waiting time before a Change of Address Order can become effective to allow for the Move Validation Letter to be issued and received?

[b]     If so, what is the waiting period?

[c]     If not, what will happen to the mail that is forwarded in response to a fraudulently submitted order?

[d]     How long after a Change of Address [COA] Order is submitted is the Move Validation Letter placed into the mail? If necessary provide separate answers for different methods of submission of the COA Order.

DBP/USPS-442                      Please refer to your response to Interrogatory DBP/USPS-104 subparts b and c.

Since a Move Validation Letter is sent to the old address regardless of whether the Change of Address [COA] Order is submitted on the Internet, by telephone, or in writing,

[a]     please explain why the credit card validation procedure is required for a COA request submitted on the Internet.

[b]     please explain why the credit card validation procedure is required for a COA request submitted by telephone.

[c]     please explain why the credit card validation procedure is not required for a COA request submitted in writing?

DBP/USPS-443                      Please refer to your response to Interrogatory DBP/USPS-104 subpart b.

[a]     How long after a Change of Address [COA] Order is submitted is the e-mail verification sent? If necessary provide separate answers for different methods of submission of the COA Order.

[b]     Please provide a copy of a sample e-mail message.

[c]     Is the e-mail system monitored to allow for receipt of an undeliverable e-mail message?

- [d] If so, what action is taken when an e-mail message is returned as undeliverable?
- [e] What happens to any mail that is forwarded before the returned message is received?
- [f] Please discuss the maximum time that can exist between the time that the verification e-mail is sent and the time that the undeliverable message notification is received.
- [g] Please confirm, or explain if you are unable to confirm, that the only verification accomplished by the e-mail verification process is whether or not the e-mail address is a valid address and not that it belongs to any particular individual.

DBP/USPS-444                      Please refer to your response to Interrogatory DBP/USPS-272. Your response indicated that the 4-state barcodes can be affixed by mailers/customers.

- [a] Are 4-state barcodes affixed by the Postal Service?
- [b] If so, please discuss the conditions and methods by which the barcodes are applied/affixed.

DBP/USPS-445                      Please refer to your response to Interrogatory DBP/USPS-274 subpart a. Please confirm, or explain and reanswer the original Interrogatory if you are unable to confirm, that regardless of whether the 4-state barcode is decoded either left to right or right to left [taking into account that the "up-down orientation" will switch directions] the same result will be received.

DBP/USPS-446                      Please refer to your response to Interrogatory DBP/USPS-274 subparts b, c, and d.

Since I received the response to subpart e of Interrogatory DBP/USPS-114 which provided information on how to manually decode a 4-state barcode, I have checked approximately 15 to 20 4-state barcodes that have been affixed to my incoming mail and have found that every one of the barcodes had only 57 bars. Please explain this condition and if appropriate, please reanswer the original Interrogatory.

DBP/USPS-447                      Please refer to your response to Interrogatory OCA/USPS-68 subpart d. Please identify the two ZIP Code areas that were removed from the EXFC ZIP Code panel and the reasons for removing them.

DBP/USPS-448                      Please refer to your response to Interrogatory DBP/USPS-286.

- [a] Are there any plans to implement electronic signatures?

[b] If so, please discuss the plans and the implementation schedule.

DBP/USPS-449 Please refer to your response to Interrogatory DBP/USPS-91 subpart d. Please explain why you state that items appearing in the Postal Operations Manual with a mandatory type of wording are considered only to be guidance as noted in the 10th word from the end of the response.

DBP/USPS-450 Please refer to your response to Interrogatory DBP/USPS-278. Since I am aware of at least one District that wants Express Mail to be deposited in a regular blue collection box, please advise and provide copies of any guidance that has been disseminated from the Headquarters level which covers this condition.

DBP/USPS-451 Please refer to your response to Interrogatory DBP/USPS-279 subparts b through e.

[a] Please confirm, or explain if you are unable to confirm, that the last sentence of your response means that if a given post office on the west coast has two separate cut-off times, namely, 2 PM for coverage to most of the 50 states and 5 PM for areas on the west coast only, that it will be permissible to have an Express Mail collection box with a single collection time of 4 PM which will arrive back at the post office too late for a guarantee to the 50 state area but in time for a guarantee to the west coast only [the 5 PM cut-off guarantee].

[b] If subpart a above is confirmed, please confirm, or explain if you are unable to confirm, that Express Mail destined for the east coast will be delayed a day if deposited in the collection box.

[c] Please explain why this scenario is an acceptable one, in other words, why isn't an earlier collection mandated to allow for processing to the area covered by the 2 PM cut-off time?

DBP/USPS-452 Please refer to your response to Interrogatory DBP/USPS-279 subparts b through e.

[a] Please explain the apparent conflict between your response to the original Interrogatory which states that Express Mail receives a service commitment based on the deposit date and DMM Section 116.1.1.b which states that Express Mail deposited in an Express Mail collection box will have a time and date of mailing of the time that the mail was brought to the Express Mail acceptance unit.

[b] Please confirm, or explain if you are unable to confirm, that DMM Section 116.1.1.b states, in effect, that the Postal Service will not accept any responsibility for Express Mail deposited in an Express Mail collection box, handed to delivery and collection employees during their normal delivery and collection duties, or picked up by USPS pickup service until the mail actually is brought back to the Express Mail acceptance unit and that in some large cities the mail may not arrive there until well into the evening and miss the dispatches of value. Furthermore, any delays or errors between the time the mail is or is supposed to be collected and the time it is actually turned over to the Express Mail acceptance unit are at the risk of the mailer.

[c] Please explain the rationale for DMM Section 116,1,1,b with respect mail deposited in an Express Mail collection box.

[d] Please explain the rationale for DMM Section 116,1,1,b with respect mail that is handed to delivery and collection employees during their normal delivery and collection duties.

[e] Please explain the rationale for DMM Section 116,1,1,b with respect mail that is picked up or is scheduled to be picked up [a missed or delayed appointment] by USPS pickup service.

DBP/USPS-453 Please refer to your response to Interrogatory DBP/USPS-279 subpart f. Your response stated that the retail computers will allow the acceptance associate to roll back the mailpiece's acceptance time to the collection box tap time.

[a] Is this a requirement rather than an option to do so?

[b] If not, why not?

[c] Is a similar roll back appropriate for Express Mail deposited at a retail service window a minute or two after the cut-off time by a customer that was waiting on line and/or a delay by the retail window clerk in processing the mailpiece?

[d] If not, why not?

---

---

### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin August 3, 2006

---

---